

SAMUEL & STEIN

ATTORNEYS AT LAW

MEMO ENDORSED

1441 BROADWAY, SUITE 6085, NEW YORK, NY 10018

PHONE: (212) 563 - 9884 | FAX: (212) 563 - 9870 | WEBSITE: [www.samuelandstein.com](http://www.samuelandstein.com)

DAVID STEIN  
[dstein@samuelandstein.com](mailto:dstein@samuelandstein.com)

December 11, 2020

ADMITTED IN  
NY, NJ, PA, IL, DC

VIA ECF

Hon. Kenneth M. Karas, U.S.D.J.  
United States District Court  
Southern District of New York  
300 Quarropas St, Chambers 533  
White Plains, NY 10601

Re: Cruz, et al. v. Great Construction Group Corp., et al.  
Docket No. 20-cv-4380 (KMK)(PED)

Dear Judge Karas:

We represent plaintiffs Jorge Cruz, Carlos Cruz, William Ordonez, and Segundo Ordonez in the above-referenced matter, and write with the consent of Joseph N. Paykin, Esq., counsel for the defendants.

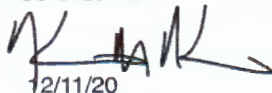
Pursuant to the Court's Order of November 12, 2020, plaintiffs' motion for FLSA collective certification pursuant to 29 U.S.C. § 216(b) is due on Monday, December 14. Plaintiffs have been working on the papers, but because of difficulties relating to COVID, we have not yet been able to obtain our clients' signatures on the supporting declarations we intend to file with our papers.

We therefore respectfully request a brief extension, until December 21, 2020, to finalize and submit our papers, as well as a commensurate one-week extension for the opposition and reply papers. This is plaintiffs' first request for an extension of the briefing schedule, and it will not affect any other deadlines in this case.

We thank the Court for its attention to this matter and are available at Your Honor's convenience should the Court have any questions regarding the foregoing.

Granted.

So Ordered.



12/11/20

Respectfully submitted,



David Stein

cc: Joseph N. Paykin, Esq. (via ECF)